

# **EXHIBIT 116**

Lisa Waters

00001

2 UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK  
4 - - - - -  
5 JANE DOE 1, Individually and on behalf  
6 of all others similarly situated,  
7 Plaintiff,  
8 vs. Case No.  
9 22-CV-10019-JSR  
10 JPMORGAN CHASE BANK, N.A.,  
11 Defendant/Third-Party  
12 Plaintiff.  
13 -----  
14 JPMORGAN CHASE BANK, N.A.,  
15 Third-Party Plaintiff,  
16 vs.  
17 JAMES EDWARD STALEY,  
18 Third-Party Defendant.  
19 -----  
20 GOVERNMENT OF THE U.S. VIRGIN ISLANDS,  
21 Plaintiff,  
22 vs. Case No.  
23 22-cv-10904-JSR  
24 JPMORGAN CHASE BANK, N.A.,  
Defendant/Third-Party  
Plaintiff.  
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JPMORGAN CHASE BANK, N.A.,  
Third-Party Plaintiff,  
vs.  
JAMES EDWARD STALEY,  
Third-Party Defendant.  
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VIDEOTAPED DEPOSITION of LISA WATERS  
WilmerHale  
60 State Street, Boston, Massachusetts  
Thursday, August 24, 2023 - 9:40 a.m.  
  
GOLKOW LITIGATION SERVICES  
877.370.DEPS

1 to remove Ms. Casey from covering Mr. Epstein?

2 A. I mean, he committed to work toward it.  
3 He said he understood why she did not want to and  
4 that no one should cover anyone they're  
5 uncomfortable with.

6 Q. And I think you said something along the  
7 lines of "we will work on that." What did you  
8 understand him to mean?

9 A. Well, my understanding what that meant is  
10 he would, he and the market manager or whoever  
11 was managing the team, would work to find another  
12 coverage person for the banking relationship  
13 there.

14 Q. Do you remember anything else that  
15 Ms. Casey said in that meeting?

16 A. No. I think that's what -- that was her  
17 topic that she wanted to cover with him and she  
18 covered that.

19 Q. Did she express an opinion in that  
20 meeting about whether Mr. Epstein should or at  
21 large remain a client of the Private Bank?

22 A. I don't believe so.

23 Q. What did you say in the meeting?

24 A. So again, it wasn't planned that I was

1       going to say something at the meeting; but I did  
2       say to him, "You know, it's very uncomfortable  
3       for anyone covering him; and no one really wants  
4       to cover him. The charges are very uncomfortable  
5       and involved a minor." I said, "My personal  
6       opinion is I have children; I wouldn't let him be  
7       around my family." I said, "How do you feel  
8       about that? You have two daughters." And he  
9       said, "I do understand how people could feel that  
10      way, and it's difficult; but I did speak with him  
11      -- Mr. Epstein -- and he said it was a  
12      misunderstanding and he made a mistake. And I do  
13      feel comfortable. I have socialized with him and  
14      my family."

15               And he was respectful; but said, you  
16      know, politely that he disagreed and that's why  
17      the decision was made.

18               And I said, "Okay. It's the company you  
19      keep; I don't feel it looks good for the firm and  
20      it makes people uncomfortable." And he said: "I  
21      appreciate you expressing your opinion."

22               He was very cordial and the discussion  
23      ended.

24               Q. Do you remember anything else he said?